

REBUTTAL TESTIMONY

of

GREG ROCKROHR

Engineering Department

Energy Division

Illinois Commerce Commission

Commonwealth Edison Company
Tariffs and charges submitted pursuant to
Section 16-108.5 of the Public Utilities Act.

Docket No. 11-0721

February 24, 2012

1 **Q. Please state your name and business address.**

2 A. My name is Greg Rockrohr. My business address is 527 East Capitol Avenue,
3 Springfield, Illinois 62701.

4 **Q. Are you the same Greg Rockrohr who previously testified in this docket?**

5 A. Yes. My prepared direct testimony in this docket is ICC Staff Exhibit 11.0.

6 **Q. What is the purpose of your rebuttal testimony?**

7 A. My rebuttal testimony responds to the rebuttal testimonies of ComEd witnesses
8 Ross Hemphill, Ph.D (ComEd Ex. 11.0) and Michael Born, P.E. (ComEd Ex.
9 18.0), who continue to advocate the Commission's use of a distribution loss
10 study that is only partially updated, identified as ComEd Ex. 7.1, for rate
11 determination in this proceeding. My rebuttal testimony explains my unchanged
12 position that the Commission should reject ComEd Ex. 7.1.

13 **Q. How did ComEd address the concerns you raised in direct testimony that**
14 **ComEd Ex. 7.1 does not comply with the Commission's Final Order in**
15 **Docket 10-0467?**

16 A. In direct testimony I explain that, though not an attorney, I understand the
17 Commission's Final Order in Docket 10-0467 to require ComEd to segregate the
18 secondary and service elements in any future rate case, and that the distribution
19 loss study ComEd submitted as ComEd Ex. 7.1 does not segregate these
20 elements.¹ In rebuttal, ComEd witness Dr. Hemphill claims that segregating
21 ComEd's secondary and service element losses is a rate design issue that must

¹ Staff Ex. 11.0, p. 3.

be addressed in a later proceeding.² While I understand that values from ComEd's distribution loss study are inputs that ComEd uses for determining rates, I do not agree that the distribution losses themselves, which are calculated independently of any rates or rate structure, are a rate design issue. Nor would providing discreet (instead of combined) values for secondary and service elements within ComEd's distribution loss study be a rate design issue. However, even if calculating distribution losses were a rate design issue, which it is not, ComEd proposes to update customer loads with its distribution loss study filed as ComEd Ex. 7.1, which results in a change in the distribution loss factors for most customer classes. In other words, ComEd's changing and shifting of loads between customer categories in its new distribution loss study, ComEd Ex. 7.1, is more of a rate design issue than simply segregating secondary and service elements without changing and shifting loads between customer categories. Nonetheless, ComEd did not provide separate values for secondary and service elements in ComEd Ex. 7.1, so my opinion remains that ComEd did not fully comply with the Commission's Final Order in Docket No. 10-0467, which I understand to require the segregation of secondary and service elements in any future rate case.³

Q. You also expressed concern in your direct testimony that ComEd Ex. 7.1 updates only customer loads without updating transmission loss percentages.⁴ Did ComEd satisfactorily address this concern?

² ComEd Ex. 11.0, p. 33.

³ May 24, 2011, Final Order, Docket No. 10-0467, p.291.

⁴ Staff Ex. 11.0, pp. 4-5.

43 A. No. ComEd simply repeats in rebuttal that ComEd Ex. 7.1 is updated for 2010
44 class load data.⁵ This is not new information, as it was already included in
45 ComEd's direct testimony and my direct testimony.⁶ Unfortunately, ComEd did
46 not explain in its rebuttal testimony why it believes updating customer loads
47 without updating transmission loss percentages is appropriate, though in my
48 direct testimony I recommended that it provide this explanation.⁷ When testifying
49 in Docket 10-0467, I explained that ComEd's use of an eleven-year old
50 transmission loss study was cause for concern because that study did not
51 include the many modifications to ComEd's transmission system that have
52 occurred since 1998, and because that 1998 transmission loss study was
53 conducted before PJM began operating ComEd's transmission system.⁸
54 Changes in transmission loss percentages and changes in customer loads both
55 affect the calculation of distribution losses,⁹ so it is perplexing that ComEd would
56 propose an update to customer loads from one year to the next that would cause
57 an increase in calculated distribution losses, while at the same time refuse to
58 update 13 year-old transmission loss percentages that would result in a reduction
59 in calculated distribution losses. I found no information in ComEd's rebuttal to
60 explain its position on this issue.

⁵ ComEd Ex. 18.0, p. 3.

⁶ Staff Ex. 11.0, pp. 4-5

⁷ Staff Ex. 11.0, p. 8.

⁸ Docket No. 10-0467, Staff Ex. 6.0, pp. 22-23.

⁹ ComEd Ex. 7.1, p. 2. In the "Summary" section, ComEd explains that distribution losses are determined by subtracting energy delivered to customers plus transmission losses from the ComEd Zone Load. The following equation represents this calculation: $DL = EP - (CL + TL)$, where DL=distribution losses; EP=energy procured; CL=retail and wholesale customer loads; and TL=transmission losses.

61 **Q. On page 3 of his rebuttal testimony, ComEd witness Born states that the**
62 **table you included on page 6 of your direct testimony that shows the**
63 **results of various ComEd distribution loss studies is not valid. How do you**
64 **respond?**

65 A. I do not understand Mr. Born's statement. The sources of the data in the table
66 are shown in the table. I explain in my direct testimony that Appendix G from
67 Docket 10-0467, ComEd Ex. 67.2, uses 2009 class loads and that ComEd's
68 distribution loss study identified as Study Report #7B includes updated
69 transmission loss percentages.¹⁰ Since I copied the values shown in the table
70 from distribution loss studies that ComEd submitted, I do not understand why Mr.
71 Born now considers the study results to be invalid because they are presented in
72 a table.

73 **Q. ComEd witness Born also testifies in rebuttal that the concerns you**
74 **expressed regarding the distribution loss study identified as "ComEd's**
75 **Study Report #3" are misplaced.¹¹ Did Mr. Born alleviate your concerns**
76 **regarding ComEd Study Report #3?**

77 A. No. I understand that Mr. Born states his opinion that, when creating Study
78 Report #3, ComEd used a reasonable methodology to segregate the secondary
79 and service conductor losses. My concerns regarding ComEd's Study Report #3
80 remain because, regardless of ComEd's methodology, the results from Study
81 Report #3 do not reflect reality.¹² Even ignoring the study results that are clearly
82 erroneous, Study Report #3 is problematic because ComEd claims that the only

¹⁰ Staff Ex. 11.0, pp. 4-5.

¹¹ ComEd Ex. 18.0, pp. 3-4.

¹² Staff Ex. 11.0, Attachment B.

intended difference between Study Report #3 and ComEd Ex. 7.1 is the separation of values for secondary and service elements.¹³ Therefore, combined values for secondary and service elements should be the same in Study Report #3 and ComEd Ex. 7.1. They are not.

Q. Are these disagreements associated with Study Report #3 important for this proceeding?

A. No. Though ComEd did not satisfy my concerns regarding Study Report #3, I am unaware of any party advocating the use of ComEd Study Report #3 in this proceeding. Therefore, disagreements about Study Report #3, while perhaps interesting, appear to me to be irrelevant to the purpose of this proceeding.

Q. Do you wish to make any additional comments regarding ComEd's distribution loss studies?

A. Yes. In my direct testimony I recommended that the Commission use distribution loss factors that resulted from Study Report #7B because they include updates to both customer loading and transmission losses. ComEd witness Born makes it clear that the only difference between the distribution loss studies presented as Study Report #7B and ComEd Ex. 7.1 is that Study Report #7B uses the results of the updated transmission loss study that the Commission directed ComEd to complete by the end of 2011.¹⁴ It is apparent to me that Study Report #7B provides superior results. As an alternative to using Study Report #7B, which is updated for both customer loads and transmission losses, I recommended that the Commission continue to use the distribution loss study that it approved in

¹³ ComEd response to Staff data request ENG 2.1, included as Attachment A.

¹⁴ ComEd Ex. 18.0, p. 2.

105 Docket 10-0467.¹⁵ ComEd provided no new information in its rebuttal testimony
106 to affect my recommendation.

107 **Q. Does this conclude your prepared rebuttal testimony?**

108 **A. Yes.**

¹⁵ Staff Ex. 11.0, p. 8.

ICC Docket No. 11-0721

Commonwealth Edison Company's Response to
Illinois Commerce Commission ("STAFF") Data Requests
GER 2.01 – 2.05

Date Received: December 8, 2011

Date Served: December 12, 2011

REQUEST NO. GER 2.01:

Staff understands ComEd's response to Staff data request GER 1.02 to indicate that the only intended substantive difference between ComEd Ex. 7.1 and Study Report #3 is that the 2010 ComEd Distribution System Loss Factor Study that ComEd filed as Study Report #3 separates losses in the secondary and service elements of ComEd's distribution system within the various customer categories. If applicable, please identify any other intended substantive differences between ComEd Ex. 7.1 and Study Report #3.

RESPONSE:

The intended difference between ComEd Ex. 7.1 and Study Report #3 is the separation of Secondary and Service conductor losses.